

1 Aaron D. Shipley (NSBN 8258)  
 2 Karyna M. Armstrong (NSBN 16044)  
 3 McDONALD CARANO LLP  
 4 2300 West Sahara Avenue, Suite 1200  
 5 Las Vegas, Nevada 89102  
 6 Telephone: (702) 873-4100  
 7 [ashipley@mcdonaldcarano.com](mailto:ashipley@mcdonaldcarano.com)  
 8 [karmstrong@mcdonaldcarano.com](mailto:karmstrong@mcdonaldcarano.com)

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 10 *Attorneys for Defendant Capital One, N.A.,*  
 11 *erroneously sued as “Capital One Bank, National Association”*

12  
 13 **UNITED STATES DISTRICT COURT**  
 14  
 15 **DISTRICT OF NEVADA**

16 MA OLIVIA ABAD,

17 Plaintiff,

v.

18 EQUIFAX INFORMATION SERVICES LLC;  
 19 EXPERIAN INFORMATION SOLUTIONS,  
 20 INC.; JPMORGAN CHASE BANK, N.A.;  
 21 CITIBANK, N.A.; SYNCRONY  
 22 FINANCIAL; CAPITAL ONE BANK,  
 23 NATIONAL ASSOCIATION; BANK OF  
 24 AMERICA CORPORATION; AMERICAN  
 25 EXPRESS, INC. and DISCOVERY BANK,

26 Defendants.

27 CASE NO.: 2:25-CV-00090-CDS-NJK

28  
**STIPULATION AND ORDER TO EXTEND  
 TIME FOR DEFENDANT CAPITAL ONE,  
 N.A. TO FILE RESPONSIVE PLEADING  
 TO COMPLAINT**

**(FIRST REQUEST)**

1 Pursuant to Local Rules 6-1 and 6-2, Plaintiff Ma Olivia Abad (“Plaintiff”) and Defendant  
 2 Capital One, N.A., erroneously sued as “Capital One Bank, National Association” (“Capital One”)  
 3 and together with Plaintiff, the “Parties”) stipulate and agree as follows:

4  
**WHEREAS:**

5 1. On or about January 29, 2025, Capital One was served with the Summons and  
 6 Complaint for the above-referenced matter;

7 2. On February 18, 2025, counsel for Capital One reached out to Plaintiff’s counsel  
 8 to gather further information regarding Plaintiff’s claims and explore the potential for an early  
 9 resolution;

10 3. On February 18, 2025, the Parties agreed that good cause exists to extend Capital

1 One's responsive pleading deadline to allow the parties to continue to devote resources to  
 2 exploring the potential for early resolution of this matter;

3       4. The Parties agree to extend the deadline for Capital One to file its responsive  
 4 pleading to the Complaint to March 21, 2025;

5       5. This stipulation is made in good faith and not for the purpose of delay; and

6       6. This is the first stipulated request to extend Capital One's responsive pleading  
 7 deadline.

8 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

9           Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended.  
 10 Capital One shall file its responsive pleading on or before March 21, 2025.

11           DATED this 19th day of February, 2025.

12           McDONALD CARANO LLP

13           DATED this 19th day of February, 2025.

14           FREEDOM LAW FIRM, LLC

15       By: /s/ Karyna M. Armstrong  
 16           Aaron D. Shipley (NSBN 8258)  
 17           Karyna M. Armstrong (NSBN 16044)  
 18           2300 West Sahara Avenue, Suite 1200  
 19           Las Vegas, Nevada 89102

20           *Attorneys for Defendant Capital One,  
 21           N.A., erroneously sued as "Capital One  
 22           Bank, National Association"*

23       By: /s/ Gerardo Avalos  
 24           George Haines (NSBN 9411)  
 25           Gerardo Avalos (NSBN 15171)  
 26           8985 South Eastern Ave., Ste. 100  
 27           Las Vegas, NV 89123

28           *Attorneys for Plaintiff Ma Olivia Abad*

21           **NO FURTHER EXTENSIONS OF THIS   IT IS SO ORDERED:  
 22           DEADLINE WILL BE GRANTED.**

23             
 24           United States Magistrate Judge

25           DATED: February 20, 2025